

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	
)	BANKRUPTCY NO. 22-20823-GLT
U LOCK INC.)	
)	CHAPTER 7
DEBTOR)	
*****)	RE: DOCUMENT NO. 258
CHRISTINE BIROS)	
)	
MOVANT)	Hearing Date: 1/20/23 @ 10:30 AM
)	Courtroom A—Pittsburgh
vs.)	
)	
ROBERT H. SLONE, Chapter 7 Trustee)	
For the Estate of U Lock, Inc.)	

**TRUSTEE'S RESPONSE TO CHRISTINE BIROS' MOTION FOR ALLOWANCE
OF ADMINISTRATIVE EXPENSE CLAIM PURSUANT TO 11 U.S.C. §503(b)(1)**

AND NOW, comes Robert H. Slone, Trustee, by and through his counsel, Mahady & Mahady—Robert H. Slone, Esquire, and files this Response to Christine Biros’ Motion for Allowance of Administrative Expense Claim Pursuant to 11 U.S.C. §503(b)(1), stating as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. The allegations of Paragraph 9 are admitted in part and denied in part in that partial relief from the automatic stay was granted to Movant, Christine Biros (“Biros”).

10. Admitted.
11. Admitted.
12. Admitted.
13. Admitted.
14. The allegation of Paragraph 14 is unknown to Respondent and strict proof thereof is demanded.
15. The allegation of Paragraph 15 is unknown to Respondent and strict proof thereof is demanded.
16. The allegation of Paragraph 16 admitted other than that partial relief from the automatic stay was granted to Biros.
17. Admitted.
18. As to paragraph 18, it is admitted that Biros. has not received any payment.
19. As to paragraph 19, the Trustee received minimal rent after the date of the bankruptcy.
20. As to paragraph 20, it is denied that the rent due is \$18,000.00 and strict proof thereof is demanded. It is further responded that the Trustee was never provided with any lease between Debtor and Biros.
21. As to paragraph 21, Biros made an updated offer for purchase of the estate assets of U Lock, Inc. by letter dated September 22, 2022, wherein Biros conservatively estimated that the administrative claim for the rent for the use and occupancy of the real property since April 27, 2022 is \$5,000.00 per month. A copy of Biros' letter dated September 22, 2022 is attached hereto and made a part hereof as Exhibit "A".
22. As to paragraph 22, at the sale hearing held December 15, 2022, Biros as a bidder asked for a credit for the administrative rent. The Court granted the sum of \$10,000.00 as an administrative rent claim., which is approximately \$1,500.00 per month.

23. The amount of gross revenue as per the Debtor's bankruptcy schedules filed in this case for the year of 2021 was \$13,200.00 and \$12,000.00 for the year 2020. It is further submitted that a review of the bank statements from Citizens Bank for the period January 1, 2022 through June 30, 2022 showed deposits and credits totaling \$2,610.00.

WHEREFORE, it is prayed that an administrative claim for rent of \$18,000.00 per month for Movant, Christine Biros, be denied and that an administrative claim for rent for Christine Biros in a lesser amount be set by the Court.

Respectfully submitted,

Dated: January 6, 2023

/s/ ROBERT H. SLONE
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BANKRUPTCY NO. 22-20823-GLT
CHAPTER 7
RE: DOCUMENT NO. 258
Hearing Date: 1/20/23 @ 10:30 AM
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**CERTIFICATE OF SERVICE FOR TRUSTEE'S RESPONSE TO CHRISITNE BIROS' MOTION
FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIM PURSUANT TO 11 U.S.C. §503(b)(1)**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below on January 6, 2023 by the following:

By First Class U.S. Mail:

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Date: January 6, 2023

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